U.S. DISTRICT COURT
N.D. OF N.Y.
FILED

JUN 2 2 2005

LAWRENCE K. BAERMAN, CLERK
ALBANY

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

V. **Criminal No.: 04-CR-544**

KUN FUK CHENG,
a/k/a STEVEN CHENG,
JIN RONG CHENG,
a/k/a JOYCE CHENG,
and HUI GUO,

Defendants.

****

BILL OF PARTICULARS

The United States provides for its Bill of Particulars as follows:

In Indictment No.04-CR-544, the United States set forth in its forfeiture allegations its intent to forfeit pursuant to:

1. Title18, United States Code, Section 982(a)(6)(A) [as well as Title 8, United States Code, Section 1324(b)(1), Title 28, United States Code, Section 2461(c)] the defendants interests, if any, in any and all property constituting or derived from a violation or conspiracy to violate, section 274(a) . . . of the Immigration and Nationality Act [8 U.S.C. § 1324(a)] . . . the court shall order that the person forfeit to the United States, regardless of any provision or State law; (i) any conveyance, including any vessel, vehicle, or aircraft used in the commission of the

offense/s or which the person/s is convicted; and (ii) any property real or personal: (I) that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted; or (II) that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted; and

2. Title 18, United States Code, Section 982(a)(1), each of the defendants, if convicted of an offense in violation of section 1956 . . . of this title, shall forfeit to the United States any property real or personal, involved in such offense, or any property traceable to such property.

The United States further wishes to particularize its intent to forfeit such property to include, but not be limited to, the following property:

Bank Accounts:

1. **Fleet Bank Account #XXXXX8984 in the names of Xiu Chai Shi and Hui Guo.**
2. **Fleet Bank Account #XXXXX2461 in the name of Hui Guo.**
3. **Fleet Bank Account #XXXXXX2931 in the name of Yu Li.**
4. **Abacus Federal Savings Bank Account #XXX-XXX660-7 in the name of Kun Fuk Cheng.**
5. **Key Bank Account #XXXXXXXXX6548 in the name of Jianfeng Qiu.**
6. **HSBC Bank Account #XXXXX5022 in the name of Kun Hui Zheng.**
7. **HSBC Bank Account #XXXXX9348 in the name of Kun Hui Zheng.**
8. **HSBC Bank Account #XXXXX4122 in the name of Xiu C. Shi.**
9. **HSBC Bank Account #XXXXX5292 in the name of Ping D. Lin.**
10. **HSBC Bank Account #XXXXX5060 in the name of Ping D. Lin.**
11. **HSBC Bank Account #XXXXXX5513 in the name of Chao Jian Lin.**
12. **Fleet Bank Account #XXXXXX3779 in the name of Chao Jian Lin.**
13. **HSBC Bank Account #XXXXX1768 in the name of Gee Yuk Yeung.**
14. **HSBC Bank Account #XXXXX2999 in the name of Gee Yuk Yeung.**
15. **The Chinese American Bank Account #XXXX7223 in the name of Kun Fuk Cheng.**

Restrained Accounts:

1. **State Farm life insurance policy, Account number XX-XXXX-6111 in the name of Jin Rong Cheng;**

2. **State Farm life insurance policy, Account number XX-XXXX-2861 in the name of Jin Rong Cheng;**

3. **State Farm life insurance policy, Account number XX-XXXX-0327 in the name of Kun Fuk Cheng;**

4. **State Farm life insurance policy, Account number XX-XXXX-2863 in the name of Kun Fuk Cheng;**

5. **State Farm life insurance policy, Account number XX-XXXX-2166 in the name of Vincent K. Cheng;**

6. **State Farm life insurance policy, Account number XX-XXXX-2156 in the name of Celia Cheng;**

Real Property:

Rome Plaza, 1471 Route 9, Halfmoon, New York 12065, Lis Pendens filed 6/17/05

Net Proceeds from Sale of Stocks:

TD Waterhouse - U.S. Steel Stock from compliance account #: XXX-X2937;

Charles Schwab - AMD and SMI Stock from account #: XXXX3818

Dated:

GLENN T. SUDDABY
UNITED STATES ATTORNEY

By: Thomas A. Capezza

Thomas A. Capezza
Assistant U. S. Attorney
Bar Roll No. 503159